

Doc 116

United States Government

Department of Energy

Rocky Flats Field Office

memorandum

DATE: JAN 27 2000

REPLY TO

ATTN OF: AME:ESD:MH:00-01176

SUBJECT: Rocky Flats Field Office Commitment to Nuclear Licensing Strategy for Closure

TO: Robert G. Card
President
Kaiser-Hill Company, L.L.C.

The purpose of this memorandum is to formally document the Department of Energy (DOE), Rocky Flats Field Office (RFFO) commitment to a regulatory strategy for the closure of the Rocky Flats Environmental Technology Site (Site) in the Kaiser-Hill Company, L.L.C. (K-H) Contract DE-AC34-00RF01904. The DOE recognizes the unique nature of the closure contract for the Site and is committed to ensuring an environment that will move the project to its safe and expeditious conclusion.

The DOE RFFO realizes that a safe, cost-effective, and high-quality closure of Rocky Flats by 2006 requires a nuclear licensing environment that matches the closure project. To that end, the DOE commits to work cooperatively with K-H to effect changes to the nuclear licensing framework necessary to enable and assist site closure by 2006. Specifically, the DOE commits to working cooperatively on the following two initiatives:

Initiative: Consolidation of Authorization Basis Credited Control Sets

Currently, with the exception of Building 559, all Hazard Category 2 and 3 facilities on Site have new generation Authorization Basis (AB) documents. Building 559 has been partially upgraded. These new documents represent a significant improvement over previous generation ABs, however, there remain inconsistencies in the application of control sets for similar accidents between facilities.

K-H will review each current AB document and map the credited systems to the accident analysis. This information will then be used to consolidate the credited systems as much as possible. The goal of the initiative will be to identify and credit those systems most effective at controlling the accident risk, while at the same time minimizing the control set to the extent practical. No more than two defense-in-depth systems will be credited for each scenario, as concurred upon by DOE. The Technical Safety Requirements (TSR) will be revised to reflect the change in credited systems, and a page change will be

submitted to DOE for approval. The revised control sets will be consistent between facilities.

Controls will be further reduced as the hazard level associated with material at risk form and quantity and combustible material quantity is reduced during decommissioning. Risk assessment and the establishment of controls will specifically consider the limited remaining life of the facility. Consideration will be given to the reduction in integrated risk associated with expediting the completion of decommissioning.

The DOE is supporting of the initiative to select the most effective control set for assuring nuclear safety, while minimizing the AB control sets to the extent practical.

Initiative: Revamp Implementation Verification Review Process

The Implementation Verification Review (IVR) will be the process by which K-H assures adequate implementation of AB documents. Every change to an AB document (page change, revision, Justification for Continued Operations, etc.) will undergo an IVR. The IVR process will be modified to define a review commensurate with the change. In the case of a simple page change that does not affect a TSR control, a review by the facility manager may be appropriate and sufficient. A major revision, or new AB document, will require a much more comprehensive, formal review, and would include independent checks by individuals outside of facility line management.

Under the construct of the K-H closure contract, it is in the best interest of K-H to revise and implement AB documents quickly and efficiently. A delay in implementation could significantly delay Decontamination and Decommissioning of a facility, for example. However, premature implementation of an AB change could have an even larger, and in some cases disastrous, impact. Therefore, K-H will assume full responsibility for implementation of AB changes. In cases where major AB changes occur as the result of planning for future activities that are not yet ready for a 425.1 readiness determination, the IVR may be performed to the 425.1 requirements. In this case, when the future activities are prepared for the readiness determination process, the readiness determination can be conducted at a level below an Operational Readiness Review. This will result in the following changes to the current practice for AB changes:

- Upon DOE approval of an AB change, K-H will develop an implementation schedule within 30 days of approval. For simple changes, the implementation schedule may be provided by K-H in the proposed change (e.g., the transmittal letter may commit to implementation 45 days from approval).
- The implementation schedule will define the IVR.
- DOE will be apprised of the schedule and plans for the IVR.

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- Any Authorization Agreement changes will be signed following successful completion of the IVR.
- The IVR process will be separated from DOE Order 425.1 except as discussed above.

The DOE is supportive of this change in methodology for the implementation of new or revised AB documents.



Paul Golan
Acting Manager

cc:
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